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March 1, 1996

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FCC MAIL ROOM

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

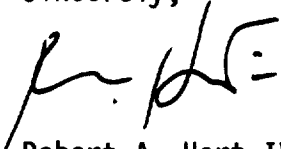
Re: In the Matter of
Interconnection between
Local Exchange Carriers and
Commercial Mobile Radio Service Providers)
CC Docket No. 95-185

Dear Mr. Caton:

We are attaching comments relative to subject docket.

These comments are submitted on behalf of Hart Engineers and 21st Century Telesis, Inc.

Sincerely,



Robert A. Hart IV,
Owner of Hart Engineers
and
CEO of 21st Century Telesis, Inc.

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In the Matter of
Interconnection between
Local Exchange Carriers and
Commercial Mobile Radio Service Providers)

CC Docket No. 95-185

COMMENTS

by

ROBERT A. HART IV,
Owner of Hart Engineers
and

CEO of 21st Century Telesis, Inc.

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FCC WASH DC

The FCC, seeking to "foster competition in the local exchange", has a huge obligation. We believe pending FCC decisions may affect situations related to the "roots of democracy" in this country and the ability for the USA to compete and win in the emerging global competitive economic environment.

Our first point is to relate our opinion of the magnitude of challenges facing the FCC. We believe that the leadership and judgment exercised by the FCC will deeply affect our country for possibly another sixty years; until approximately the year 2050. (It has been sixty-two years since the last national telecommunications legislation.) This is a significant responsibility to say the least.

Our second point is that a social contract relating to telecommunications has existed for many years (sometimes referred to as subsidies by people, companies and/or organizations with specific agendas). This social contract is called the Universal Service Fund (USF) and includes historical division of revenue processes among existing local exchange carriers coupled with their obligation of carrier-of-last-resort. Although these concepts are all linked, we will discuss this situation in broad terms for simplicity using the title of Universal Service Fund. This fund may need to be eventually "unbundled" as a result of the decision to embrace competition in the local exchange, coupled with advances in technologies. The FCC must make informed judgments relative to targeting "unbundled" USF elements in a manner consistent with basic characteristics of a given technology. In other words, leadership by the FCC is important to

encourage the proper technologies to be widely deployed which most appropriately meet the fundamental applications associated with the technology. Without this leadership, improper technologies could theoretically be deployed penalizing the evolution of information age infrastructure in our country.

The space program is a wonderful program but is not privatized. Satellite technologies have special niche applications probably not related to "local loop" telephony, in our opinion, as compared to terrestrial (land) based technology.

Cellular telephone and emerging "high tier" Personal Communications Services (PCS) were and are technologies of relatively high power and are optimized for vehicular mobility. To date, communications at 55 mph has been more of a luxury than a necessity as compared to basic telephony.

Clearly "low tier" PCS may compete with past technologies related to "local loop" telephony.

In our opinion, enhancing and exploiting huge embedded infrastructure investments should be encouraged (especially twisted pair and coaxial facilities).

"Wireless", as compared to new wired-based infrastructures, can usually be deployed more quickly over a given geographic area. Duplication of facilities will generally increase reliability. As we depend more on information age communication facilities, rather than the automotive highway, increased reliability may be very desirable.

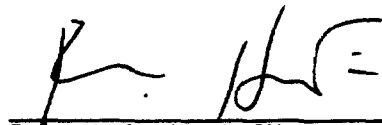
To keep an interconnected "network of networks" stable in an overload (or fault) condition, a master of interconnection element in a hybrid decentralized network may be desirable coupled to carrier-of-last resort obligations.

COMMENTS by Robert A. Hart IV

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In summary, we believe the consequences of pending decisions are enormous. "Unbundled" USF elements and changes in carrier interconnection philosophies should encourage deployment of technologies of best fit, with associated flexibility regarding provision of affordable future communication services. Once a "level playing field" can be declared in the local exchange, future technological enhancements will theoretically be driven by market forces relative to the future services demanded by the public.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'R. Hart IV', written over a horizontal line.

Robert A. Hart IV,
Owner of Hart Engineers
and
CEO of 21st Century Telesis, Inc.

March 1, 1996